

## REMARKS

This responds to the Final Office Action dated March 3, 2010.

Claims 1, 14, 27, and 40 are amended, no claims are canceled, and no claims are added; as a result, claims 1-50 are pending in this application.

### The Rejection of Claims Under § 103

Claims 1-50 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Odiaka (US Pat. 6,829,347) in view of Brawn et al (US Pat. 7,020,718), hereafter "Brawn."

Applicants respectfully submit that the Office Action did not make out a *prima facie* case of obviousness for at least the following reasons. Even if combined, the cited references fail to teach or suggest all of the claimed elements of Applicants' claimed embodiments.

Odiaka describes a method of selecting a trail using a constraint based routing technique in which at least one user-determined routing policy is used to bias input to a Dijkstra/Yen-K shortest path routing engine, so as to limit output by the routine engine to routes conforming to the user-determined routing policy.

On pages 2-3 of the Final Office Action, the following is asserted:

6. As to claim 1, Odiaka discloses ... identifying one or more common blocks of policy statements within the policy (column 6, lines 60-63 and column 7, Table 1; default values read on common blocks; i.e. each [of the] policies will have the common data fields); assigning sets of parameters to elements of the one or more common blocks (column 7, Table 1; further column 7, lines 17-26, defines various default policies based upon customer needs, with associated default values in the data fields (i.e. parameters of the one or more common blocks)); (emphasis added).

However, the Office Action fails to explain how default values, such as the default values shown in Odiaka, are suggestive of the identification of common blocks of policy statements, the common blocks of policy statements sharing a similar structure, and at least one common block being re-used with a different assigned set of parameters as claimed (e.g., see amended claims 1, 14, 27, and 40). As clearly described in the present application, the claimed policy statements are not merely parameter values, default or otherwise, as asserted in the Office Action. In contrast, the common blocks of policy statements as currently claimed are re-usable constructs that can be

used with different sets of parameters. This aspect of the claimed embodiments is described in the present specification as follows:

In some embodiments, parameterization is applied to routing policy and routing-policy configuration. In these embodiments, routing-policy language for a router includes two major constructs to a configuration, which may significantly reduce the amount of configuration required to specify routing policy. The first construct provides a basic modularity such that common blocks of policy may be specified once and reused. In some embodiments, hierarchical reuse may be used where a policy may reuse and/or make reference to one or more common policy blocks. More than one level of hierarchy may also be permitted. The second construct may allow common blocks of policy to be parameterized. Parameterization allows policies that share similar structure and may reference different values within that structure to be defined, stored and maintained once. Each variant or invocation of a parameterized policy may maintain appropriate parameters for a variant rather storing and maintaining a full copy of each variant of the policy. (Present Specification, pg. 2, lines 8-21)

Odiaka does not disclose or suggest a method, apparatus, or system to parameterize a routing policy, wherein the parameterizing includes identifying one or more common blocks of policy statements within the routing policy, the common blocks of policy statements sharing a similar structure, assigning sets of parameters to elements of the one or more common blocks, at least one common block being re-used with a different assigned set of parameters, and enabling a hierarchical arrangement of the one or more common blocks of policy statements within the routing policy as currently claimed (e.g., see amended claims 1, 14, 27, and 40). Odiaka does not disclose or suggest identifying common blocks of policy statements. Odiaka does not disclose or suggest maintaining common blocks that can be re-used with a different set of parameters. This is clearly different than merely maintaining default values for a data structure as in Odiaka. Further, Odiaka does not disclose or suggest a hierarchical arrangement of common blocks of policy statements. As such, Odiaka does not anticipate or suggest the presently claimed embodiments of claims 1-50.

Brown describes a method of creating a discontiguous address plan for an enterprise. The method includes determining a hierarchy of routing optimization for an enterprise, determining a number of route advertisement aggregation points at each level of the hierarchy, determining a number of network security policy areas for the enterprise, and determining a number of addresses for each of the network security policy areas. However, Brown does not disclose or

suggest the elements missing from Odiaka as explained above. In particular, Brawn does not disclose or suggest a method, apparatus, or system to parameterize a routing policy, wherein the parameterizing includes identifying one or more common blocks of policy statements within the routing policy, the common blocks of policy statements sharing a similar structure, assigning sets of parameters to elements of the one or more common blocks, at least one common block being re-used with a different assigned set of parameters, and enabling a hierarchical arrangement of the one or more common blocks of policy statements within the routing policy as currently claimed (e.g., see amended claims 1, 14, 27, and 40).

Thus, Odiaka and/or Brawn alone or in combination do not render obvious the presently claimed embodiments. The Applicants respectfully request withdrawal of the §103(a) rejections.

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone the undersigned at (408) 406-4855 to facilitate prosecution of this application.

If necessary, please charge any additional fees or deficiencies, or credit any overpayments to Deposit Account No. 19-0743.

Respectfully submitted,

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Date 6 July 2010

By / James H. Salter /

JHS:clk

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 6th day of July, 2010.

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